

EXHIBIT F

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

RICHARD CHAKEJIAN,
Plaintiff,
vs.
EQUIFAX INFORMATION
SERVICES, LLC,
Defendant.

)
)
)
) FILE NO.
)
) C.A. No. 07-2211
)
) CLASS ACTION
)
)

COPY

Deposition of ANDY W. KLAER, taken on
behalf of the Plaintiff, pursuant to
Subpoena, before Judy B. Mangiafico,
Certified Court Reporter, at 1100 Alderman
Drive, Alpharetta, Georgia, on the 1st day
of August 2008, commencing at the hour of
1:40 p.m.

DEB PUCKETT & ASSOCIATES
636 OLD IVY ROAD
ATLANTA, GEORGIA 30342
(404) 365-9015

DEB PUCKETT & ASSOCIATES

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Q Okay. Do you know what a furnisher is under the Fair Credit Reporting Act?
MS. CUTTER: Object to form.

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A Yes.
Q And how do you know that?
A I have read that section of the FCRA years ago.
Q Okay. And did your company have any policies or practices to comply as a furnisher under the FCRA with respect to public record data?
MS. CUTTER: Object to form.
A NDR had practices related to providing public records around how to conduct consumer dispute verification.
Q Did ChoicePoint consider itself to be a furnisher of information under the Fair Credit Reporting Act?
MS. CUTTER: Object to form.
A NDR was considered a provider of public records.

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Q Okay. Is your testimony today that ChoicePoint or any arm of ChoicePoint that had to do with public records between 2003 and 2007 was not a furnisher under the FCRA?

MR. PERLING: Objection, asked and answered. You are covering the same grounds here, John.

BY MR. SOUMILAS:

Q I want it clear for the record. Is that your testimony, Mr. Klaer?

A Yes.